

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

HOLLY RINGLING, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

BETMGM, LLC,

Defendant.

Civil Action No. 2:22-cv-07462-JXN-  
CLW

**[PROPOSED] CONSENT ORDER EXTENDING TIME  
FOR DEFENDANT TO RESPOND TO COMPLAINT**

Pursuant to Local Rule 6.1 and this Court's judicial preferences regarding extension of time requests, Defendant submits this proposed consent order for approval and entry by the Court.

WHEREAS, on December 22, 2022, Plaintiff filed the complaint in this action;

WHEREAS, on December 27, 2022, Defendant was served with the summons and complaint;

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a), the deadline for Defendant's response to the complaint is currently January 17, 2023;

WHEREAS, due to the service of process over the holiday period, Defendant

was only recently able to retain counsel for this action;

WHEREAS, the parties have conferred and agree to extend the time within which Defendant may respond to the complaint by 30 days, up to and including February 16, 2023;

WHEREAS, there have been no similar extensions previously obtained;

WHEREAS, the parties agree that this proposed consent order does not waive any right of the parties to seek further extensions from this Court;

WHEREAS, the parties agree that nothing in this stipulation shall be construed as a waiver of any of Plaintiff's or Defendant's rights, defenses, or arguments they would otherwise have;

IT IS STIPULATED AND AGREED THAT, subject to the Court's approval,

1. Defendant shall have up to and including February 16, 2023, to respond to the complaint.

2. Nothing in this consent order shall be construed as a waiver of any of Plaintiff's or Defendant's rights, defenses, or arguments they would otherwise have.

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

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HON. JULIEN X. NEALS  
UNITED STATES DISTRICT JUDGE

Defendant BetMGM, LLC consents to the form and entry of this order.

Dated: January 13, 2023

By: /s/ Stephanie L. Silvano  
STEPHANIE L. SILVANO

Stephanie L. Silvano (NJ #168182016)  
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*Attorneys for Defendant BetMGM, LLC*

Plaintiff Holly Ringling consents to the form and entry of this order.

Dated: January 13, 2023

By: /s/ Javier L. Merino  
JAVIER L. MERINO

Javier L. Merino (NJ #078112014)  
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